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7 Counsel for Defendant ISAAC

8
9 IN THE UNITED STATES DISTRICT COURT
10
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA
12
13 SAN FRANCISCO DIVISION
14

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 v.

18 TOMMY ISAAC,

19 Defendant.

Case No. 19-31 WHO

**STIPULATION AND [PROPOSED]
ORDER**

20 The defense respectfully requests a further continuance of sentencing of approximately 30 days.
21 The defense previously requested an additional 60 days because the sentencing conflicted with a trial set
22 for earlier this year. The Court granted a continuance to March 26, 2025. Unfortunately, undersigned
23 counsel was obligated to request a brief continuance of that trial, which was granted by Judge Illston;
24 however, the trial was continued to a date that conflicts with sentencing in this matter (defense counsel
25 unsuccessfully requested an alternative trial date that did not conflict with this hearing). Opening
26 statements are on March 17, 2025, and the parties anticipate a three-week trial. Accordingly, defense
27 counsel requests that this sentencing be continued 30 days to April 23, 2025. Although Mr. Isaac is in
28 custody, the continuance will not impact his sentence given the defense's anticipated recommendation.
The government and Probation have no objection. Neither party anticipates any further continuances.

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1 IT IS SO STIPULATED.

2
3 March 4, 2025
4 Dated

5 /S
6 _____
7 DAVID W. RIZK
8 RIZK & SHEARER LLP
9 Counsel for Mr. Isaac

10 March 4, 2025
11 Dated

12 PATRICK ROBBINS
13 Acting United States Attorney
14 Northern District of California

15 /S
16 _____
17 JEFFREY BORNSTEIN
18 Assistant United States Attorney

19 IT IS SO ORDERED.

20
21 _____
22 Dated

23 _____
24 WILLIAM H. ORRICK
25 Senior United States District Judge